

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Qwest Communications)	WC Docket No. 02-314
International Inc.)	
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services)	
in Colorado, Idaho, Iowa, Nebraska, North)	
Dakota, Montana, Utah, Washington,)	
and Wyoming)	

REPLY DECLARATION OF JUDITH L. BRUNSTING

**Section 271(d)(3)(B)
Compliance with Section 272 by Qwest LD Corp.**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Qwest Communications)	WC Docket No. 02-314
International Inc.)	
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services)	
in Colorado, Idaho, Iowa, Nebraska, North)	
Dakota, Montana, Utah, Washington,)	
and Wyoming)	

REPLY DECLARATION OF JUDITH L. BRUNSTING

**Section 271(d)(3)(B)
Compliance with Section 272 by Qwest LD Corp.**

1. The purpose of this Reply Declaration is to respond to comments in the record regarding Qwest LD Corp.'s showing that it will comply with Section 272 upon grant of Section 271 authority. As in my initial Declaration in this docket, I may refer to Qwest Corporation, which is the Bell Operating Company, as "QC" or "the BOC"; and to Qwest LD Corp., my employer, which is the Section 272 affiliate, as "QLDC."

2. QLDC is much more than a mere shell corporation and will have the ability to provide long-distance service in the states that are the subject of this application. QLDC will operate as a switchless reseller providing services to customers by reselling the services of an unaffiliated interexchange carrier. QLDC has entered into a contract with WorldCom pursuant to which WorldCom will be

the underlying provider of those services. Test plans are under development to test the components of ordering, provisioning, call completion, billing and customer care. All of the practices and training for compliance with Section 272 that had been implemented in Qwest Communications Corporation (“QCC”) have been overlaid onto QLDC.

3. The principal initial responsibilities of the employees of QLDC have been to identify the operational capability needed of the facilities-based interexchange carrier and to negotiate the resale contract. QLDC is also developing plans to sell long-distance service and prepare for customer inquiries at launch. A billing and collection agreement is also being negotiated with QC.

4. *Contracts with QC.* In its comments, AT&T observes that QLDC has “far fewer contracts with QC than did QCC.” AT&T Qwest III Comments at 20. Some of the services that QC has provided to QCC are for out-of-region QCC operations that are not applicable to QLDC, such as Bill Printing & Processing and Correspondence Center. Other services that QC has provided to QCC will not be necessary to carry out QLDC’s business plan to operate as a switchless reseller, such as Access to Mineral Lab Facility or Wholesale Sales & Service.

5. *State certificates.* QLDC is in the process of obtaining any authorizations from state telecommunications regulatory agencies that are necessary for the provision of intrastate interLATA service in the states that are the subject of this application. QLDC expects to have obtained any necessary

authorizations by the time this Commission grants Section 271 authority and will comply with applicable state regulatory requirements.

6. *Physical separation.* QLDC has its corporate offices at 930 15th Street in Denver. The office space and furniture at that office are leased from QC, however, the space is located separately on the first floor. Locked doors with badge screeners restrict entrance into the secure area and only allow access to employees of QLDC. No other offices are located on the first floor, and QLDC's fax services, phone system, and mail are handled separately from those of QC. QLDC employees in Ohio and Virginia are also physically separated (on separate floors) from QC employees.

7. It is true, as I said in my initial Declaration in this docket, that employees of QLDC have the same red dot on their badges and office nameplates that employees of QCC have. Red serves to identify an employee as an employee of a Section 272 affiliate who must, for example, not have access to certain confidential QC information.

8. *Employee reporting.* I have verified that there is no employee of QLDC to whom a BOC employee reports, and there is no employee of QLDC who reports to any employee of the BOC.

9. *Training of QLDC employees.* The workforce of QLDC was built through the posting of positions, interest expressed by employees of other Qwest companies, and then acceptance of the positions by returning an offer letter signed by the prospective employee. Each new hire has completed the Exit Checklist with

his or her former employer and signed the acknowledgement of the rules governing sharing of information. Each employee then received training and signed an acknowledgment that he or she understood all the requirements.

10. Like me, a number of QLDC employees have previously been employed by QCC, and in some cases by its predecessor as Qwest's 272 affiliate, Qwest Long Distance Inc. (formerly U S WEST Long Distance, Inc.). In those prior positions, these employees have acquired experience not only about the nature of the long-distance business (since QCC continues to provide out-of-region service) but also of the particular requirements of Section 272 applicable to such affiliates. Other QLDC employees were previously employed by Qwest Services Corporation. All QLDC employees had received training on Section 272 requirements in their prior employment. Once QLDC was formed, an additional training package was developed for QLDC that focused specifically on the requirements between QLDC and the BOC. It also mentioned that QCC would maintain its compliance with Section 272's requirements. All of QLDC's employees were trained again on the requirements of Section 272 using that new training package and using pre-existing training materials, covering the code of conduct, information sharing, and how to request services from QC. This is explained in part VI of my initial Declaration in this docket, and training materials are included in Exhibits JLB-QLDC-14 and -16 to that Declaration. All QLDC employees have signed statements acknowledging that they have read and understood those materials.

11. *Accounting.* QLDC is a newly formed company whose books and records reflect incorporation, financing, set-up and planning activities. The policies and practices related to the accounting transactions currently under review by management and KPMG LLP for potential restatement have not been and are not applied by QLDC.

12. This concludes my Reply Declaration.